



November 14, 2016

Via ECFS

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Connect America Fund – WC Docket No. 10-90

Dear Ms. Dortch:

The purpose of this letter is to provide remarks, in response to the Federal Communications Commission Wireline Competition Bureau Public Notice, released November 2, 2016, requesting comments for consideration about the high level of interest in A-CAM model-based support.”ⁱ

ENMR Telephone Cooperative (“ENMR”) encourages the FCC to allocate full funding to the 216 companies that elected the Alternative Connect America Cost Model (“A-CAM”) support. ENMR concurs with Michael R. Romano, NTCA, when he states “This collective sum of *up to* \$260 million per year represents the most effective “down payment” the Commission could possibly make on rural broadband, allowing the seeds of the reforms that it planted earlier this year to take root and thrive”.ⁱⁱ

Should the FCC determine full funding is not prudent, ENMR proposes a support mechanism that freezes Section 54.311(e) “glide path” carriers at their initial A-CAM support offer and related deployment obligations. All other electing companies should receive at least the amount of their 2015 high cost (“HC”) support, plus a proration of additional funds added by the FCC. This would be an equitable solution since the principal funding for the A-CAM comes from the 2015 HC amount for each company. This would assure none of the companies whose A-CAM offer exceeded their 2015 support would receive less than their 2015 HC amount. Any reduction in funding should see a corresponding reduction in deployment obligations.

The Universal Service Principles indicate mechanisms to preserve and advance universal service shall be “specific, predictable and sufficient” and that “access to advanced telecommunications and information services should be provided in all regions of the Nation”. To this end, any resolution to the shortfall considered should, at the very least, not have a derogatory effect on the process of bringing reasonably priced advanced telecommunications to all areas.

I appreciate your consideration of this important matter. Please feel free to contact me if you require further information or assistance.

Sincerely,

Tom M. Phelps
CEO

ⁱ November 2, 2016 FCC Public Notice DA 16-1246: Wireline Competition Bureau Announces Results of Rate-of-Return Carriers that Accepted Offer of Model Support.

ⁱⁱ *Ex Parte* Notice from Michael R. Romano, NTCA, to Marlene H. Dortch, WC Docket No. 10-90 (filed November 14, 2016).

